

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the Matter of:

Revitalization of the AM Radio Service

Notice of Proposed Rulemaking

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MD Docket No. 13-249

To: Honorable Marlene H. Dortch
Secretary of the Commission

ATTN: Peter H. Doyle
Chief, Audio Services Division, Media Bureau

COMMENTS OF GEORGIA-CAROLINA RADIOCASTING COMPANIES

Georgia-Carolina Radiocasting Companies ("GACA") through various corporate subsidiaries is licensee of AM Broadcast Stations: WFSC, 1050 kHz, Franklin, North Carolina (Facility ID # 14554), WHTD, 1340 kHz, Mountain City, Georgia (Facility ID # 69703), WGHC, 1400 kHz, Clayton, Georgia (Facility ID # 160276), WNEG, 630 kHz, Toccoa, Georgia (Facility ID # 63330), WSGC, Elberton, Georgia (Facility ID # 54562), and WSNW, Seneca, South Carolina (Facility ID # 5969). GACA submits comments with respect to the above-captioned Notice of Proposed Rulemaking concerning the United States AM Radio Service. In support thereof, the following is set forth for each of the Commission proposals.

**A. OPEN FM TRANSLATOR FILING WINDOW EXCLUSIVELY FOR AM
LICENSEES AND PERMITTEES**

GACA supports all of the provisions of the proposal for AM Stations to receive FM translators but would also request special protection of these FM translator stations from full-power FM stations. In the future, should a full-power FM station propose facilities that would displace the translator being used by an AM station, the full-power station must provide a substitution frequency and pay the costs of moving the AM station's translator frequency. This is similar in scope to the current requirement of FM stations displacing other FM stations with equal facilities. The worst possible scenario would be for an AM station to have a FM Translator station then lose it in the future.

We also suggest that should the scarcity of FM spectrum limit the availability of FM translator facilities for AM stations, the Commission should establish a priority ranking for AM stations with those stations which have the most limited facilities having priority over AM stations with full-time facilities and stations in less served areas should receive preference over those operating in more populated areas.

**B. MODIFY DAYTIME COMMUNITY COVERAGE STANDARDS FOR
EXISTING AM STATIONS**

GACA supports the recommendation of the Minority Media Telecommunications Council which suggested AM stations be required to provide coverage to 50 percent of its community of license with a city grade contour.

C. MODIFY NIGHTTIME COMMUNITY COVERAGE STANDARDS FOR EXISTING AM STATIONS

GACA supports a reduction in the level of signal required for non Class D AM stations to cover their city of license. We suggest the minimum signal strength should be 5 mV/m and should cover not less than 50% of the city of license. Interference-free nighttime signal strength coverage is virtually impossible for any Class C AM station, even those operating in the smallest communities, and is no longer economically feasible for any other AM radio station which typically would have to install highly complex directional antenna arrays.

GACA would further encourage the FCC to allow stations to directly negotiate interference agreements subject to Commission consent. If an AM station is willing to accept greater interference from another AM station, then if mutually acceptable, those licensees should be allowed to enter into legally binding agreements to effectuate such changes as long as stations not involved in the agreement are not subjected to new interference.

D. ELIMINATE THE AM "RATCHET RULE"

GACA supports the elimination of the "Ratchet Rule" as it has proven to penalize the very medium it was designed to assist. In today's world, any AM station needing to move its transmitting facilities must first overcome the financial cost of such a move and often discovers it must reduce its coverage of its local market due to this requirement. This is counterproductive to the future of the AM radio service. Furthermore, GACA suggest the Commission "grandfather" the AM station's existing nighttime limits so that it doesn't "lose ground" to other AM stations which located on the station's frequency since it was first licensed. Those subsequently licensed stations are already receiving interference from the older station and therefore have less to lose in signal coverage than the older station modifying its facilities which could now be required to protect the later licensed stations, potentially in the direction of its city of license if utilizing a directional antenna system.

E. PERMIT WIDER IMPLEMENTATION OF MODULATION DEPENDENT CARRIER LEVEL CONTROL TECHNOLOGIES

GACA supports this technology and petitions the Commission to no longer require AM stations to seek waivers or experimentation status to utilize it. A simple notification similar to FM Stations utilizing IBOC technology must provide would suffice.

F. MODIFY AM ANTENNA EFFICIENCY STANDARDS

While GACA supports some relaxation of efficiency requirements, it believes that some general standard should be maintained to avoid some operators using substandard facilities that would lead to further degradation of the AM band. We believe that the minimum efficiency for all classes of AM stations should not be less than 180 mV/m for 1 kW at 1 km, not just for Class C stations as the Commission has proposed.

G. COMMENTS / SUBMISSION OF FURTHER PROPOSALS

GACA encourages the Commission to also consider these suggestions to enhance the AM band in the United States:

- A) allow the use of 530 kHz with a filing preference given to the most limited AM facilities in the least served areas receiving priority status should a mutual exclusivity situation develop.
- B) allow the use of the expanded band frequencies for both existing and proposed AM stations with filing preference given to the most limited AM facilities in the least served areas
- C) allow AM stations to make major change facility modifications at any time versus only during an AM filing window as now is the case. AM facility modifications should be treated with the same standard as FM stations now enjoy and the need for such modifications is often more urgent than it is for FM stations. AM Stations now can't improve their facilities because the Commission's limited financial and human resources doesn't allow it to authorize frequent filing windows and evidenced by the fact the most recent AM major change filing window occurred ten (10) years ago.
- D) Allow all AM stations, as international treaties will allow, to begin operations with their daytime facilities at 5 a.m. local time until 7 p.m. local time. This change will allow those AM stations to reach the bulk of their audience during the hours the public is typically commuting to their jobs and schools and radio audience surveys demonstrate the majority of the American public listens to radio. We agree with others filing comments on this rulemaking that this one change would likely be the most significant enhancement to improve the viability of the AM radio service. It should be noted that in the 1950s, most Class D stations, then known as regional channels, were allowed to begin operations with daytime facilities at 6 a.m. subject to interference complaints. GACA would accept such restrictions with its 5 a.m. to 7 p.m. operating schedule proposal but request that individual stations be allowed to negotiate directly over resolutions of the interference issues and not be subject to immediate cessation of the operations by the Commission.

Where international and domestic treaties restrict the operation of other AM stations due to the restriction of skywave propagation of AM signals during nighttime hours, GACA requests that the Commission immediately enact negotiations and policy to allow these stations to operate with not less than 250 watts from 5 a.m. to local sunrise and from local sunset to 7 p.m.

- E) GACA urges the Commission to modify the nighttime signal protection of the Class A "Clear Channel" AM stations. The skywave coverage areas of these stations, much like other AM stations, has been severely degraded over the years for a host of reasons not caused by other stations and its simply no longer a service utilized by the public except for DX hobbyist whose romantic memories of long distance AM service is appreciated but in no way relates to the limitations this antiquated policy causes to some 10,000 other AM stations that do not enjoy this protection. We suggest that the stations big signal status be maintained to a more appropriate level of 0.5 mV/m ground wave signal for both

nighttime and daytime protection. Even with this reduced protection, these stations will continue to enjoy huge swaths of sky wave coverage but on a much more practical basis in the year, 2014.

- F) GACA believes there are many hundreds if not thousands of AM stations which would be incentivized to relinquish their AM licenses if the Commission would have Congress enact tax credits for the surrender of AM station licenses. Almost everyone can agree there are simply too many AM stations yet many licensees, especially those with companion FM stations, allow the AM stations to limp along in the least costly fashion often times providing limited public service and the most minimum compliant facilities. These stations, we suggest numbering in the thousands, do much to degrade the band and especially its credibility among the listening and advertising public. Should Congress provide a significant tax credit, we believe there would be a large scale surrendering of the licenses. We would suggest that these tax credits be commensurate with the population served by the license and a sliding scale based loosely on the Commission's license fee structure be utilized with the minimum tax credit being \$100,000 for the AM licenses in the least populated areas and to allow the transfer of these "credits" from surrendered AM licenses to profitable operators. Additionally, to further encourage the surrender of these licenses, GACA suggest the FCC not allow the utilization of these surrendered frequencies by any other operator serving the same area as the surrendered licensee for a period of five (5) years from the date the license is deleted.
- G) GACA urges the Commission to reenact requirements mandating that utility companies transmitting their electrical services through above ground wires, be required to frequently monitor these lines for spurious electromagnetic signals due to failed components and malfunctioning connections. Throughout the United States, this one action would greatly reduce the noise level that has developed over the last several decades even while the Commission enacted policy to overcome degraded radio receiver standards.

Georgia-Carolina Radiocasting Companies commends the Federal Communications Commission for its willingness to assist AM radio stations and consider various policy changes and adjustments which will enhance the United States oldest public medium which continues to provide great public service to Americans. That being said, we point out the obvious that if serious is not taken, and enacted sooner rather than later, the very survival of the band is highly questionable.

It is time to act.

Respectfully submitted,

GEORGIA-CAROLINA RADIOCASTING COMPANIES



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President/CEO